

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

MARDY B. WILLIAMS, SR.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:05CV-1220-WKW
	)	
NORMENT SECURITY GROUP, INC., ET	)	Judge W. Keith Watkins
AL.,	)	
	)	
Defendants.	)	
	)	

**REPORT OF PARTIES' PLANNING MEETING**

Plaintiff, by his attorney, Brantley W. Lyons, P.C., and Defendant Norment Security Group, Inc.,<sup>1</sup> by its attorneys, Capell & Howard P.C. and Seyfarth Shaw LLP, respectfully submit this Report of Parties' Planning Meeting in accordance with Fed. R. Civ. P. 26(f).

1. Pursuant to Fed. R. Civ. P. 26(f), a telephonic meeting was held on August 11, 2006 and was attended by Brantley W. Lyons for Plaintiff and Molly Eastman for Defendant.

2. Pre-Discovery Disclosures. The parties will exchange by October 20, 2006 the information required by Fed. R. Civ. P. 26(a)(1).

3. Discovery Plan. The parties jointly propose to the Court the following discovery plan:

(a) Discovery will be needed on the following subjects: Liability for Plaintiff's race discrimination claims, the extent of any damages, and Plaintiff's mitigation (if any) of their alleged damages. The parties do not waive any arguments regarding the scope or propriety of any requested discovery.

(b) All discovery will be completed by April 30, 2007.

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<sup>1</sup> Plaintiff's claims against Defendant Ted Arkuszeski, John Woods, and Burtice Bright were dismissed by this Court's order dated June 29, 2006.

(c) Each party may propound a maximum of 25 interrogatories and 25 requests for admission, exclusive of requests for admission dealing only with the authenticity of documents, upon the other party. Each party may propound upon the other party an unlimited number of requests for the production of documents. Following the parties' respective production of documents, counsel will confer and attempt to agree upon a maximum for requests for admission concerning the authenticity of documents.

A maximum of 10 depositions may be noticed and taken by each party.

The parties have agreed otherwise to adhere to the limitations and response times set forth in the Federal Rules of Civil Procedure, unless subsequently changed or extended by agreement of the parties or Court order.

Reports from retained experts under Rule 26(a)(2) are due:

From Plaintiff by March 15, 2007; and

From Defendant by March 30, 2007.

4. Other Items:

Plaintiff should be allowed until February 15, 2007 to join additional parties and to amend the pleadings.

Defendant should be allowed until March 15, 2007 to join additional parties and to amend the pleadings.

All dispositive motions should be filed by April 2, 2007. Any response to a dispositive motion shall be filed within 30 days, and any reply thereto shall be filed within 21 days.

Deadlines for filing of witness and exhibit lists and dates for a final pre-trial conference and trial should be set following the Court's ruling on any dispositive motions. The parties anticipate that the case can be ready for trial 60 days after any order denying motions for summary judgment.

The parties request a pretrial conference no earlier than 30 days after the Court has ruled on dispositive motions and at least ten days before trial.

At this time, the parties do not consent to the exercise of final dispositive jurisdiction by a magistrate judge.

To date, the parties have not discussed the possibility of settlement, but

they anticipate that they may attempt to do so at some point after discovery has commenced.

Respectfully submitted,

By: s/ Brantley W. Lyons  
One of Plaintiff's Attorneys

By: s/ Molly Eastman  
One of Defendant's Attorneys

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Dated: August 30, 2006

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2006, I electronically filed **Report of Parties' Planning Meeting** with the Clerk of Court using the CM/ECF system, which will send notification of this filing to:

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s/ Bruce J. Downey  
Bruce J. Downey